

Technical Analysis and Findings Utah Coal Regulatory Program

PID: C0410002 TaskID: 4583

Mine Name: SUFCO MINE

Title: UNDERMINING OF SHELTERS

Environmental Resource Information

Historic and Archeological Resource Information

Analysis:

On April 29, 2014 the Division received an aamendment to chapter 4 of the current MRP. This findings document will include an analysis of that information as related to the Cultural Resource sections of the regulations. The information includes text changes to pages 4-12A and 4-12B and the addition of a drawing to Appendix 4-2 showing the locations of the two eligible sites(shelters) in relation to the projected mining and corresponding angle of draw.

In August of 2013 a cultural resource Inventory of approximately 300 acres in the South Fork of Quitchupah Canyon was performed by EnviroWest LLC for Canyon fuels Company. The class three pedestrian survey resulted in the documentation of five new cultural resource sites. There were three lithic scatters along the bench areas and two shelters along the bottom of the canyon. The three scatters were identified as 4SV3548, SV3549 ans SV3552 and the two shelters as 4SV3550 and SV3551. In order to determine the full cultural depth and significance of the two eligible sites, (shelters) additional substantial testing was recommended.

The Forest Service with the concurrence of The State Historic Preservation Office (SHPO) noted in their determination of significance and effect that mining under the shelters would have an adverse effect on the sites. ""It is; likely that the roofs these shelters will collapse if longwall mining occurs under them. These actions would destroy the sites' archaeological value (as defined by criterion D) as well as their cultural value for Tribes.""

The Division's review of the drawing to be included in Appendix 4-2 has noted that the angle of draw when properly located will include shelter # 4SV3550 as such a mitigation plan for the shelter will be required by The Division, The Forest Service and The State Historic Preservation Office (SHPO).

Deficiencies Details:

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Operation Plan

Subsidence Control Plan Subsidence

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Deficiencies Details:

R645-301.525.541 The location of the angle of draw line drawn on the map titled 'Projected Subsidence Analysis Sufco 3R2S/South Fork Quitchupah Shelter Area' has been incorrectly placed. The permittee must depict the angle of draw measured from the outermost boundary of any underground workings.

R645-301.525.240 The permittee must submit a detailed subsidence analysis that pertains to the areas beneath and adjacent to the rock shelters. The surface subsidence analysis performed by Jake Smith, including supporting calculations, provided through a memorandum will be considered adequate and should be submitted in such a way as to be kept confidential, according to R645-301.525.240.

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